



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street

San Francisco, Ca. 94105

20 JUN 1986

Certified Mail: P017637916  
Return Receipt Requested

John P. McDonnell, President  
Douglas Aircraft Company  
c/o McDonnell Douglas Corporation  
P.O. Box 516  
St. Louis, Missouri 63166

Re: Notice Letter/Request for Information  
Operating Industries, Inc.  
900 Potrero Grande Drive, Monterey Park, California

Dear Mr. McDonnell:

The United States Environmental Protection Agency (EPA) is spending public funds to investigate and take corrective action for the control of actual and threatened releases of hazardous substances at the Operating Industries site. This site is on the National Priorities List (NPL) of "Superfund" sites. The purpose of this letter is twofold: to inform you that EPA considers your company a potentially responsible party at the Operating Industries site, and secondly, to request information regarding the site.

Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §6901 et seq. (CERCLA) and other laws, responsible parties may be obligated to take actions that EPA determines necessary to protect public health or welfare or the environment. Responsible parties are liable for costs incurred by the government in responding to any release or threatened release at the site. Such costs can include expenditures for investigation, planning, cleanup of the site, and enforcement. By this letter, EPA notifies your company of its potential liability with regard to this matter and encourages it to voluntarily undertake future cleanup activities at EPA's direction.

Responsible parties under CERCLA include current and past owners and operators, and persons who generated hazardous substances or were involved in the transport, treatment, or disposal of hazardous substances. Based on site records and hazardous waste manifests, EPA has information indicating that your company may be a responsible party. EPA believes that Douglas Aircraft Company did by contract, agreement or other mechanism arrange for the disposal, treatment, or the transportation for disposal

or treatment, of hazardous substances at the Operating Industries facility during its operation from 1948 to 1984.

EPA is conducting the following activities at the Operating Industries site:

1. A Remedial Investigation (RI) to identify and define the nature and extent of soil, air, surface water, and groundwater contamination at the site. This site characterization began in June, 1985, and is expected to take three years to complete;
2. A Feasibility Study (FS) to evaluate possible remedial actions necessary to abate the threat or potential threat to public health or welfare or the environment posed by this site. This study will be conducted in 1987 and 1988 based upon the data gathered during the RI.
3. Interim Actions to address immediate site problems such as slope instability, gas migration, and leachate generation and migration prior to implementation of a final remedy. These urgent Interim Actions began in 1984, and are on-going.

You should notify EPA in writing by certified mail, within thirty (30) calendar days of receipt of this letter, of your company's willingness to participate in the above activities. Otherwise, EPA will assume that your company declines any involvement in site activities, and we will proceed with the appropriate actions and studies needed to stabilize and fully characterize the site. EPA may later request or require that your company design and implement the final remedy.

EPA encourages good faith negotiations between your company and the Agency, and among your company and other parties potentially responsible for the Operating Industries site. We have enclosed the names of other potentially responsible parties identified to date so that you may contact one another, discuss these matters, and organize yourselves into a single representative body to facilitate negotiations with the Agency. To this end, we will invite you to attend an informational meeting sponsored by EPA to be held later this summer.

Your written response to this part of the letter should indicate your company's willingness to participate in the above activities. Also include the appropriate name, address, and telephone number for further contact with you and the name, address, and telephone number of the person to whom all future Agency correspondence should be directed. Please forward your response within thirty (30) calendar days of receipt of this letter to:

Lisa Haage, Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont Street  
San Francisco, California 94105

Request for Information

EPA requests all information and documents retained by your company regarding the Operating Industries, Inc. facility (OII) located at 900 Potrero Grande Drive, Monterey Park, California. This request is made pursuant to Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §9607(a) and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §6904(e).

In addition to providing these documents, you are required to provide the following specific information pursuant to the statutory provisions of RCRA §3007(a) and CERCLA §104(e):

1. Provide a list, by insurer and policy number, identifying all comprehensive general liability and environmental impairment insurance currently in effect for Douglas Aircraft Company covering personal injury and property damage to third parties, both for sudden and non-sudden accidental occurrences. In addition, specify the policy limits and expiration date for each policy.
2. Provide an audited set of financial statements which includes a Statement of Financial Position/ Balance Sheet, Income Statement, and Statement of Changes in Working Capital, and any other supplementary information for your company's most recent fiscal year.

Questions 3 through 7 refer to all past and present Douglas Aircraft Company facilities which sent substances to OII including, but not limited to, those located at:

19502 South Normandie, Torrance, California  
3855 Lakewood Boulevard, Long Beach, California

3. For each substance used or generated by your company at any of its facilities, which was taken to the Operating Industries site, provide written descriptions of:
  - (a) the common chemical name, specific chemical name, and chemical composition by volume or weight;
  - (b) the total amount, in gallons for liquids and tons for solids;
  - (c) the specific manufacturing process that used or generated the substance (e.g., mill machining);

- (d) the solid, liquid, or gaseous waste stream that contained the substance (e.g., sump contents from mill machining building). If the substance as disposed contained several different waste streams (e.g., cooling tower blowdown water and spent acid plating solutions), provide the information for each individual waste stream, including the concentration of all substances in the waste stream;
- (e) the name and address of the transporter(s) used, both at the time of disposal and presently;
- (f) the means and the contractual arrangements for transport to the OII site; and
- (g) the date of disposal of the substance.

4. Company disposal records in EPA's possession indicate that certain waste streams generated at Douglas Aircraft Company facilities were disposed of at OII. Using the format specified in question 3, describe the following:

- (a) the manufacturing processes and the substances used or generated in those processes which are described in disposal records from the 19502 South Normandie, Torrance, California facility as: "waste water treatment"; "machine cooling"; "equipment cleaning"; "metal polishing"; "alkaline solution" from "caustic"; "parts cleaning"; "sol oil"; "deburring machines"; "process waste tanks"; "wash rack"; "boiler blowout stripper"; "cooling tower"; "2PP11 sumps"; "stripper slab tank"; "dye and water" from "tank 400 testing"; "steam slab"; "chip compactor"; "paint booth" including but not limited to the use or generation of "paint sludge", and "oil"; and "aircraft mfg" including but not limited to the use or generation of "soap", "biodegradable oil", "waste water", "lime sludge", and "wtr base paint sludge"; and
- (b) the manufacturing processes and the substances used or generated in those processes which are described in disposal records from the 3855 Lakewood Boulevard, Long Beach, California facility as: "sumps" "59", "60", "34", "441", "ramp catch sumps", "plant wide sumps", "catch sump compactor", "catch sumps", and "mill sumps" including but not limited to the use, generation, or collection of "oil fuel", "oil", "paint sludge", "solvent", "biodegradable machine coolant", and "sediment"; "mill coolant compactor"; "alkaline solution" from "machine equip cleaning"; "polyglycol antifreeze" from "antifreeze"; "plating mill"; "clarifier"; "paint booth" including but not limited to the use or generation of "scrubber solution" and "paint



sludge"; "alkaline solution" from "alum metal cleaning tank"; "metal cleaning"; and "spar mill" including but not limited to the use or generation of "machine tool coolant" and "resin waste."

5. Where, other than OII, did those Douglas Aircraft Company facilities referenced on page three dispose of wastes during the time period 1948 to 1983? Specify both the type of facility (e.g., sanitary sewer, Class 1 disposal facility, onsite disposal, etc.) and where appropriate the name and address of the facility. Describe all waste streams from the above-referenced facilities and the typical disposal methods. Include information for those waste streams which were recycled or treated prior to disposal.
6. Describe the products used to clean equipment at the facilities referenced on page three, and give the dates of their use. Provide the brand name, chemical composition, and disposal history for each product. Specifically, describe those products used in equipment cleaning, tank cleaning, sump cleaning, pit cleaning, or part cleaning.
7. Describe the waste treatment processes which were used at the facilities referenced on page three. For each facility, identify the source of the wastestreams which were treated. Describe the chemical composition and characteristics of:  
a) the influent, b) the effluent, and c) any sludges, scum, or other concentrated wastes produced in the treatment processes.

The scope of this request extends to all information and documents developed or obtained by your company, its employees, agents, consultants, or attorneys and any of the attorney's agents, consultants, or employees. The word "documents" means any written, recorded, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist and includes originals, all prior drafts, and all non-identical copies.

For your information, the term "substance", as used above, means matter in any state (e.g., liquid, solid or gaseous, or any combination thereof) and includes each element, compound, mixture, or solution comprising the substance. A substance includes, but is not limited to, hazardous wastes and hazardous substances as defined under Section 1004(5) of RCRA and Section 101(14) of CERCLA respectively. The words "hazardous substances," "hazardous waste," and "person" are defined at 42 U.S.C. Section 9601(14), 42 U.S.C. Section 6903(5), and 42 U.S.C. Section 6903(15) of CERCLA.

Federal law requires that the requested information be provided to EPA. Section 3007(a) of RCRA provides that "...any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the U.S. Environmental Protection Agency...furnish information relating to such wastes...." Section 104(e) of CERCLA provides that EPA may request information and records relating to hazardous substances from "...any person who stores, treats, or disposes of, or, where necessary to ascertain facts not available at the facility where such hazardous substances are located, who generates, transports, or otherwise handles or has handled, hazardous substances...." Failure to comply with this request can subject you and your company to compliance orders, civil actions, and penalties.

You may assert a business confidentiality claim covering all or part of the information requested in this letter, as provided at 40 C.F.R. Section 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public without further notice to you.

Your response, in writing by certified mail, to both parts of this letter, must be signed by you or a duly authorized official of your company, and submitted to the following office within thirty (30) days of receipt of this letter. Your response should be directed to:

Lisa Haage, Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region IX  
215 Fremont Street  
San Francisco, California 94105

Please include in your response to this request a notarized affidavit from a responsible company official stating: 1) that a diligent record search has been completed; and 2) that there has been a diligent interviewing process with present and former employees who may have knowledge of operations, chemical use, and waste disposal practices. Also, include in the affidavit a statement that all information responsive to EPA's requests of this letter has been sent to the Agency.

Your reply to the request for information under Section 104 of CERCLA and Section 3007 of RCRA should be considered separate and distinct from your reply relating to participation in cleanup response activities at the site.

If you need further information concerning the technical aspects of this request, please contact Therese Gioia of my staff at (415) 974-7465. Any legal matters should be referred to John Rothman (415) 974-7453 or Lisa Haage (415) 974-8043 of the Office of Regional Counsel. Your cooperation in this matter is appreciated.

Sincerely yours,

A handwritten signature in cursive script, reading "Harry Seraydarian".

Harry Seraydarian

Director

Toxics and Waste Management Division

Enclosure



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

20 JUN 1986

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Responsible parties under CERCLA include current and past owners and operators, and persons who generated hazardous substances or were involved in the transport, treatment, or disposal of hazardous substances. Based on site records and hazardous waste manifests, EPA has information indicating that your company may be a responsible party. <sup>CONCURRENCES</sup> EPA believes that Douglas Aircraft

SYMBOL	Company did by contract, agreement or other mechanism arrange			
SURNAME	for the disposal, treatment, or the transportation for disposal			
DATE	6-19-86	6/19/86	6/19/86	6/19/86



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The scope of this request extends to all information and documents developed or obtained by your company, its employees, agents, consultants, or attorneys and any of the attorney's agents, consultants, or employees. The word "documents" means any written, recorded, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist and includes originals, all prior drafts, and all non-identical copies.

For your information, the term "substance", as used above, means matter in any state (e.g., liquid, solid or gaseous, or any combination thereof) and includes each element, compound, mixture, or solution comprising the substance. A substance includes, but is not limited to, hazardous wastes and hazardous substances as defined under Section 1004(5) of RCRA and Section 101(14) of CERCLA respectively. The words "hazardous substances," "hazardous waste," and "person" are defined at 42 U.S.C. Section 9601(14), 42 U.S.C. Section 6903(5), and 42 U.S.C. Section 6903(15) of CERCLA.



Federal law requires that the requested information be provided to EPA. Section 3007(a) of RCRA provides that "...any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the U.S. Environmental Protection Agency...furnish information relating to such wastes...." Section 104(e) of CERCLA provides that EPA may request information and records relating to hazardous substances from "...any person who stores, treats, or disposes of, or, where necessary to ascertain facts not available at the facility where such hazardous substances are located, who generates, transports, or otherwise handles or has handled, hazardous substances...." Failure to comply with this request can subject you and your company to compliance orders, civil actions, and penalties.

You may assert a business confidentiality claim covering all or part of the information requested in this letter, as provided at 40 C.F.R. Section 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public without further notice to you.

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U.S. Environmental Protection Agency  
Region IX  
215 Fremont Street  
San Francisco, California 94105

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Your reply to the request for information under Section 104 of CERCLA and Section 3007 of RCRA should be considered separate and distinct from your reply relating to participation in cleanup response activities at the site.



If you need further information concerning the technical aspects of this request, please contact Therese Gioia of my staff at (415) 974-7465. Any legal matters should be referred to John Rothman (415) 974-7453 or Lisa Haage (415) 974-8043 of the Office of Regional Counsel. Your cooperation in this matter is appreciated.

Sincerely yours,

Original Signed by:

Harry Seraydarian  
Director  
Toxics and Waste Management Division

Enclosure

T-4-1: Gioia: Faye: 6/19/86: 982A



P 017 637 916

# RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1964-448-014

Sent to <u>John P. McDonnell, Pres</u>	
<u>Douglas Aircraft Co / McDonnell Douglas</u>	
Street and No. <u>P.O. Box 516</u>	
P.O., State and ZIP Code <u>St. Louis, Missouri 63166</u>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, Feb. 1982

PS Form 3811, July 1983 447-845

**SENDER: Complete items 1, 2, 3 and 4.**

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- ☒ Show to whom, date and address of delivery.
- ☐ Restricted Delivery.

3. Article Addressed to:  
John P. McDonnell, President  
Douglas Aircraft Co,  
40 McDonnell Douglas Corp  
P.O. Box 516  
St. Louis, MO 63166

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD <u>017637916</u>

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
X

6. Signature - Agent  
X Allen

7. Date of Delivery  
JUN 24 1986

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT